

INTRODUCTION

The City of Muskegon, like many towns in the U.S. Great Lakes basin, has a history of heavy industrial commerce. In Muskegon's case, much of this industry originated with metal foundry operations that supported the national defense and the automotive of which industries. both tremendously in the 1940's and 1950's. Machining and pattern making which are both affiliated with these industries, are heavily represented in Muskegon's past. Industrial and heavy commercial continue to represent important economic engines in the community. Nearly 30 percent of today's workforce in Muskegon is in manufacturing.

Muskegon's industrial history led to the general perception of the City as a factory or "foundry town." To some, Muskegon is an archetypal example of a rust belt, old industrial town, which has seen better days and is somehow tainted with the remnants of its industrial history. While Muskegon does have over 100 acres of brownfield sites in the Downtown area, the City's brownfield aggressive plan for redevelopment is designed to negate these perceptions by bringing new businesses back to the urban core. For example, the City was awarded a \$1,000,000 Site Assessment Fund grant to perform an inof and depth analysis to develop recommendations lakefront on 13 brownfield sites. This work is currently being performed under the Muskegon areawide site assessment program. To continue the progress made under the Site Assessment Fund grant, limited a brownfield analysis was undertaken as part of the City's planning efforts to evaluate the

current regulatory climate, identify funding incentives for brownfield and tax redevelopment, identify known sites of environmental contamination, evaluate the impact of contamination on the economic viability of these sites in light current and foreseeable land use. and recommendations for supplementing the City's existing brownfield strategy. analysis is essentially a "snap shot" in time and was not intended to be an in-depth analysis of all brownfield sites in the City.

Old industrial and heavy commercial properties may have been impacted by historical manufacturing and hazardous substance management activities. Although, environmental current regulations ensure that today's industries do not adversely affect human health or the environment, buyer's concerns about liability for cleanup of old releases has driven industrial and commercial development to undeveloped greenfield sites. This threat of historical contamination, whether real or perceived, has been a barrier to the productive use of abandoned and under utilized "brownfield" sites. The public's belief that brownfield and Superfund sites are synonymous unfairly stigmatizes many industrial and properties. commercial Although brownfield sites may be contaminated, the contamination usually does not severely impact site use, and any necessary cleanup can normally be performed within a reasonably short time frame.

The following section on the new regulatory climate for brownfield sites describes how the legislature has removed many of the disincentives to the redevelopment of contaminated property.





The intent of the Part 201 amendments to the Michigan Natural Resources and Environmental Protection Act (NREPA, formerly Act 307) is to level the playing field. That is, to remove environmental concerns as an obstacle to redevelopment. All of the other factors that come into play when comparing an existing site to a greenfield site such as infrastructure improvements and demolition costs must still be considered. There are, however, benefits to the community and the private sector that are unique to brownfields.

The potential benefits to the community from brownfield redevelopment include:

- ♠ Recovery of tax base. When an industrial or commercial site is closed or abandoned tax revenues are significantly reduced, if not eliminated. Bringing business back to these sites puts them back on the tax roles.
- **Job Creation.** Redeveloping brownfield sites creates jobs in the urban core City and helps to revitalize the surrounding neighborhoods.
- ♠ Reuse of existing infrastructure. Unlike an undeveloped, "greenfield" site, brownfield sites have existing infrastructure. The availability of sewer, water, roads, and utilities may result in substantial cost savings, as compared to a greenfield site. Any improvements made as part of the brownfield development benefit the surrounding community.
- Preservation of open space.
 Redeveloping abandoned or idle industrial and commercial properties

preserves open space by reducing urban sprawl.

♦ Environmental improvements. Abandoned industrial and commercial properties present unknown risks to public health and the environment. Any potential risks are evaluated and addressed during the redevelopment of a brownfield site through the use of exposure controls and/or cleanup, resulting in a cleaner and safer community.

Brownfield redevelopment also benefits the private parties that are involved in the transaction. The following describes the potential benefits for the major players in a brownfield redevelopment project:

- Lending Institutions. Lending institutions benefit because redevelopment means new opportunities for business. Under today's legal and regulatory climate in Michigan liability concerns regarding brownfield sites are minimized, and there by reducing the risk to the loan collateral and the borrower's business plan.
- Buyers and Developers. Buyers and developers benefit directly from the broader selection of properties from which to choose. Many brownfield sites are less costly than greenfield and the funding and tax incentives that are available for brownfields often makes the brownfield site very competitive.
- ◆ The Property Owner or Seller. The property owner or seller may be either private or public. For the public seller,





brownfield redevelopment provides the obvious benefit of returning an unused or underutilized property to productive and revenue-generating use. For the private seller, it offers the opportunity to realize a financial return on a property that might otherwise remain dormant.

- ◆ Environmental Regulators.

 Environmental regulators are direct beneficiaries whenever a successful development plan becomes the environmental remedy of a contaminated site. This helps meet the regulatory goal of cleaning up the environment.
- ◆ Contractors and Construction Firms.

 Contractors and construction firms benefit from construction of new facilities on the redeveloped site or rehabilitation of existing buildings. This activity represents jobs and direct economic impact on the community.
- Real Estate Brokers The amendments to Part 201 have eliminated many of the barriers to brownfield redevelopment, allowing real estate brokers to actively market their portfolio of industrial or commercial brownfield properties.

REGULATORY CLIMATE

Prior to June 1995, the high cost of attempting to "clean close" historically impacted property combined with the specter of strict, joint and several liability had brought industrial property transactions in Michigan to a halt. Buyers chose greenfield sites to avoid cleanup costs and environmental liability. Many property owners who knew or suspected that they

had environmental contamination problem "warehoused" unused properties due to fear of what a buyer's due diligence process might find. The June 5, 1995 amendments to Part 201 significantly changed the dynamics of brownfield property transactions and site remediation by creating new liability exemptions for lenders buvers. and innocent owner/operators; establishing risk-based cleanup criteria; and requiring responsible parties to take affirmative steps to remediate contamination.

The Part 201 amendments are critical to a community's ability to successfully redevelop brownfield sites. The legislative intent behind the amendments was to foster the redevelopment and reuse of vacant manufacturing facilities and abandoned industrial sites that have economic potential if the redevelopment or reuse assures the protection of the public health, safety, welfare, and the environment.

Part 201 addresses the liability concerns of buyers and lenders with regards to state enforcement. Many potential brownfield developers are still concerned about the U.S. EPA and Superfund. Although the federal Superfund law still has a strict, joint and several liability scheme, the U.S. EPA recognizes that an adversarial, enforcement approach will drive developers away from brownfield sites. They have entered into a memoranda of agreement with Michigan Department of Environmental Quality (MDEQ) that recognizes Michigan's Part 201 program and basically limits federal involvement to sites on the National Priorities List, sites subject to a Superfund orders, or sites where there is a substantial or imminent threat to human health or the





environment. This means that federal enforcement is not a threat for the majority of brownfield sites.

FEDERAL BROWNFIELD INIATIVES

The U.S. EPA has developed a Brownfields Economic Redevelopment Initiative to assist communities in revitalizing historically industrial properties. This program includes:

- removing sites from the Superfund tracking system list that do not warrant federal involvement;
- amending the National Priorities List to allow partial de-listing as a site is remediated;
- creating guidance for prospective purchaser agreements and expanding the circumstances under which the U.S. EPA will enter into agreements not to sue a buyer for existing contamination;
- issuing a directive that encourages the consideration of land use when developing cleanup criteria;
- developing an orphan share funding program for funding the portions of clean-up costs attributable to insolvent liable parties (note: this program is under funded);
- issuing guidance that clarifies Superfund liability for lenders, local units of government, and owners of property with contaminated aquifers.

SUMMARY OF PART 201

Liability. In the past, any owner of a property could be held responsible for contamination, regardless of fault. Part 201 now assigns responsibility to the party that caused the contamination. purchaser can avoid liability by diligently documenting investigating and environmental condition of the property. Where a property is found to be contaminated, a "Baseline Environmental Assessment" (BEA) can be performed and disclosed to the State of Michigan (and subsequent purchasers), thereby avoiding liability for any existing contamination. Although such liability protection requires time and money, it now allows a party to purchase and use contaminated property without acquiring the responsibility for fully investigating and cleaning up existing contamination.

"Innocent" buyers still have to comply with a "due care" requirement, regardless of fault. Unlike the BEA, which is a "snapshot in time," this due care obligation is on going. The focus of due care is to make sure that the site is safe for the public and employees, and that the new use does not make the existing contamination worse. The level of investigation to satisfy due care may extend beyond what is necessary for a BEA. It may also lead to remediation and/or the use of engineering institutional controls to prevent adverse exposures. The risk-based cleanup criteria described below ensure that remediation is focused only on what is appropriate for the type of site use.

Cleanup Standards. The Part 201 amendments establish a reasonable, risk





based approach to the remediation of industrial sites. We no longer assume that all properties must be cleaned up to pristine levels. Part 201 now requires that future land use be incorporated into setting the cleanup standards for a particular site. Institutional controls, such as a restrictive covenant on the property deed that prohibits the installation of potable wells and engineering controls such as using pavement to cover stained soils, may be adverse to prevent exposures need eliminating the for expensive cleanups. Often site improvements such as a building expansion or paved parking may be used to address due care concerns.

Liability Protection for Local Units of Government. Part 201 (Section 26) recognizes the key role that municipal government plays in brownfield redevelopment. The following exemptions from liability were designed to assist local units of government in their role:

- a local unit of government that acquires property involuntary (e.g. tax reversion) is not liable;
- a local unit of government that acquires an easement, or acquires an interest in property through dedication, or as a public right-of-way, is not liable; and
- ◆ a local unit of government that leases property to another party is not liable.

Liability Protection for Lenders. Part 201 clarifies legal liability for lenders to encourage them to make loans on brownfield sites. Lenders may foreclose on contaminated property without assuming liability for cleanup if they prepare an

adequate BEA, and may turn the property over to the state if environmental conditions have made it unmarketable. Since the amendments prohibit the imposition of superliens on non-liable parties, the potential for the lender's security interest to be impaired is reduced. The statute also provides guidance on what is and is not considered participating in the management of a facility," thereby assisting lenders in defining their role and limiting their liability.

FUNDING AND TAX INCENTIVES

Environmental Protection Bond Fund

In November 1988, Michigan voters approved the Environmental Protection Bond. Of the \$800 million approved, \$425 million was targeted toward the cleanup of contaminated with sites hazardous substances. The Environmental Protection Bond Implementation Act (1988 PA 328) set aside \$45 million from the bond in a reclamation program (SRP) encourage reuse of contaminated sites for economic development. At the time of this writing, the existing funding level in the SRP is approximately \$20 million.

Environmental Cleanup and Redevelopment Funding Legislation

The legislature enacted additional incentives in the summer of 1996 to facilitate the successful implementation of Part 201. The five-bill package was designed to meet the following goals:

 to provide a new source of funding for cleanups;





- to facilitate brownfield redevelopment;
- to provide new local funding mechanisms; and
- to focus spending priorities on the protection and human health and the environment.

The cleanup incentives include the state revitalization revolving loan fund, the ability for municipalities to capture state and local property taxes for cleanup costs through brownfield redevelopment authorities and a single business tax credit program for response activities at brownfield sites.

The Brownfield Redevelopment Financing Act will allow cities like Muskegon to create Brownfield Redevelopment Authorities to capture state and local property taxes to pay for response activities at contaminated sites within brownfield redevelopment zones. This act also allows municipalities to establish a local site remediation revolving loan fund.

A credit against the single business tax is available for qualified taxpayers that perform response activities at contaminated site in а brownfield redevelopment zone. This incentive is only available for parties who are not liable under Section 26 of Part 201.

Michigan Jobs Commission Grants and Loans

The Michigan Renaissance Fund also has two programs that are designed to assist local units of government in revitalizing brownfield sites. The Center of Michigan's Renaissance Program provides loans for site assembly and clearance and/or rehabilitation and loans or grants for infrastructure. The second program under the Michigan Renaissance Fund is the Michigan Community Development Block Grant (CDBG) program. Grants are available for communities under 50,000 under this program for economic development, public infrastructure, land acquisition, clearance and/or rehabilitation.

The long-term viability of the Renaissance Fund is unknown at the time of this writing. The fund receives revenues from tribal casinos (i.e., 8 percent of electronic gambling revenue). The new law that allows for casinos in Detroit nullifies this 1993 revenues sharing agreement. A state court recently ruled against the tribes requiring the revenue sharing agreement to stay in place until a Detroit casino opens. This should provide funding for the next two years.

Other possible funding sources include:

- the CDBG Economic Development Infrastructure Programs
- the CDBG Economic Development Planning Program
- ♦ the CDBG Rebuild Michigan Program

U.S. EPA Brownfield Grants

The U.S. EPA has a Brownfields Pilot grant program which provides up to \$200,000 to states, local units of government and Indian-tribes to support creative site assessment, clean-up and redevelopment solutions for brownfield sites.

Introduction to City's





BROWNFIELD REDEVELOPMENT PROGRAM

Muskegon's Downtown has over 100 acres of brownfield property. Three projects along the waterfront are excellent examples Muskegon's successful brownfield redevelopment. The Waterfront Center is a mixed-use commercial retail office and marina complex that was built on an eleven acre industrial site. Heritage Landing transformed a former scrap metal yard into a 20 acre park complete with a playground, waterfront walkway and festival band shell. The corporate headquarters for the SPX Corporation was built on a 15 acre foundry site. This site also includes a marina and restaurant.

Muskegon has aggressively pursued state funds to facilitate brownfield redevelopment. The City was awarded a \$1,000,000 grant under the Michigan Site Assessment Fund. The funds are being used to do an in-depth investigation at 13 brownfield sites along the Muskegon lakefront.

The City recognizes that environmental concerns are only one factor in the redevelopment of contaminated sites. Muskegon's brownfield redevelopment program is a piece of a well established economic development incentives program. The City has both a federal and state enterprise zone designation which provides businesses within these zones the opportunity to receive many special incentives. The City operates two Local Development Finance Authorities, one in each industrial park, and a Downtown Development Authority within the central

business district to capture incremental taxes for reinvestment within the district.

BROWNFIELD SCREENING

Approach

The City of Muskegon has begun several efforts to address brownfields, including the identification of properties that were impacted potentially historical by manufacturing or commercial activities, the implementation of an area wide site assessment program under a state grant; the redevelopment of brownfield sites through public/private partnerships and the creation of a brownfield redevelopment authority. As part of this Master Plan, a formally documented list of environmentally contaminated sites was reviewed and each site was groundtruthed for its actual location in the City. This information was loaded into one layer of the City's geographic information system (GIS), in order to provide for further analysis or study Sites that are being as necessary. investigated under the Site Assessment Fund program will be added to this base when the project is completed. The site list was also compared to the overall plan recommendations, and considered for the development of specific recommendations with respect to brownfield redevelopment.

The source of the data was the MDEQ, which is charged with tracking all known sites of contamination within the State. Specifically, the last printed a list of contaminated sites was reviewed ("Michigan Sites of Environmental Contamination" Volume I, April 1995 for Fiscal Year 1996, Michigan Department of Natural Resources, Environmental Response





Division). This list contains sites which are known by the State to be impacted with substances which are regulated under Part 201; the impact may take the form of soil or groundwater contamination, and to a lesser extent, surface water and sediment contamination.

Associated with the contaminated sites list, and also included in this analysis, were leaking underground storage tank (LUST) sites. The LUST sites included in this analysis were those published by MDEQ at the same time as the Part 201 list.

The Part 201 and LUST sites listed by the MDEQ represent the sites that are known to the Department. The MDEQ is constantly revising this list to make both additions and deletions. There are also sites that would meet the definition of a brownfield that are not on either list. For example, the City is working on a number of sites through the Site Assessment Fund program and other redevelopment efforts that are not on the state list:

- ◆ Terrace Street Lots
- Muskegon Rag and Metal
- ◆ Carpenter Brothers Building
- Amazon Building
- ♦ Westran Facility
- West Michigan Street Foundry
- ◆ CMS Consumer Site
- Muskegon Farmers Market
- ◆ Fisher Steel
- Muskegon Cast Products
- ◆ Teledyne Lakefront Site
- ♦ Muskegon Boiler Works
- Westshore Pavilion
- **♦** Interspace

Results

Fourteen Act 307 and 19 LUST sites in the City of Muskegon are shown on Map entitles "Part 201 of NREPA and LUST Site Inventory. The recorded name, location, regulatory status, and in the case of Part 201 sites, pollutants of concern are listed in Tables 8.1 and 8.2. All locations were groundtruthed using the MDEO published data (note there may have been errors in the database and exact ownership may be in dispute or no longer current). Site names may refer to previous owners, managers, or simply a nearby landmark; regulatory status may change over time; and pollutants of concern can change as new field and laboratory data is obtained for a particular site.

PART 201 AND LUST MAPPING GENERAL FINDINGS

- ◆ There are fewer than expected known sites of contamination within the City limits. This analysis contradicts the public perception of the City of Muskegon as a land area containing a large number of contaminated properties.
- ◆ While some general trends in the distribution of the sites across the City are apparent, no particular area exhibits a high concentration. The distribution can generally be tied to historic industrial areas and commercial corridors, the latter more likely to contain LUST sites (as expected given the common location of automotive service facilities). The Muskegon Lake shoreline is also an identifiable area of known sites; this reflects the general





industrial history of the shoreline.

- The sites identified and mapped in this analysis provide a good indicator of where similar, but unidentified sites may occur. Commercial corridors, the Muskegon Lake shoreline and other historic industrial locations would be expected to exhibit environmental contamination.
- Many of the sites are in current use, with little apparent adverse impact arising from the identified contamination. Approximately 65 percent of the identified sites appear to be in current use, most of these in a manner similar to their original use.

Comparison to Existing and Future Land Uses

To evaluate the potential effect of these sites on current land use patterns and to make the recommendations for future land use addressed elsewhere in the Master Plan, several sub-areas were delineated.

◆ Muskegon Lake Shoreline. The shoreline is in transition from nearly ubiquitous industrial land use. Thus it is not surprising that this exercise identified that nearly 30 percent of all Part 201 and LUST sites within the City were in close proximity to the Lake. The shoreline is also known to be the location of significant quantities of sand previously used in foundry operations. Future land use plans for the shoreline are based on a fully mixed use, with greenspace and parkland, possibly commercial, and residential use planned, although some industrial use will likely remain for many years.

- ◆ Menendorp Industrial Park. About 20 percent of the sites are in the "middle-aged" industrial area in the southeastern part of the City; the area that is now planned as the Menendorp Industrial Park. Though six sites are associated with this area, only two were identified as Part 201 sites.
- The **South-Central** Area Around Laketon and Seaway. This historic industrial area is home to several identified sites, including the Brunswick facility which is an important part of Muskegon's current and historical economic vitality. Many of these sites are in close proximity to an historic railroad line, a common indicator of industrial property use in urban areas. Much of this area is also planned to continue in industrial use.
- Commercial Corridors. Several important streets commercial or corridors in the City are the locations of LUST sites. This is a common phenomena, and Getty and Laketon both exhibited this character. maior commercial corridors with historic automotive service facilities (e.g., Henry) likely have tank-related concerns.

Since the City's industrial areas and commercial corridors are generally expected to remain in industrial or commercial use, the negative impact of environmental contamination on the City's land use plans appears to be limited. The new state liability standards are specifically





designed to avoid placing the burden of environmental remediation on new owners or managers of a property. While taking the necessary steps to avoid acquiring liability for past contamination requires some cost and time (i.e., through the creation and filing of a BEA), these costs should be manageable in most cases.

Likewise, the new land use or exposure-based cleanup standards allow considerable flexibility in the use of contaminated property, as long as these issues are adequately incorporated in the planning and site development steps. In some cases, commercial use of an industrial property may allow less restrictive standards than industrial uses. The use of former industrial site for residential or recreational use may require additional remediation or more extensive exposure controls.

While historical contamination is not an insurmountable barrier, there are steps the City can take to level the playing field for brownfield sites and get underutilized property back into full and productive use. For instance, some property owners are reluctant to take any action with their property because they believe there is a significant possibility they will be required to undertake massive environmental investigation and remediation efforts. By actively seeking incentives for these owners to act, the City will be able to prevent the "warehousing" of historically its commercial and industrial land.

CONCLUSIONS AND RECOMMENDATIONS

Steven Brooks recently wrote for the National League of Cites that "a City that encourages brownfields redevelopment can attract new business to its community, broaden its tax base, increase construction activity, and create jobs." The City of Muskegon recognizes these benefits and has integrated brownfield programs into their existing economic development incentives framework. The recommendations outlined below are designed to build on the success of the Site Assessment Fund grant and take advantage of the favorable regulatory climate and state and federal brownfield incentives.

Specific Recommendations

- Continue the brownfield screening program and determine current ownership of sites on the list. For example, a review of City directories would provide information on sites with industrial histories that are likely to be impacted.
- Continue to update the brownfield GIS layer so that it may be used as a planning tool for brownfield redevelopment. Consider expanding the number of fields to increase its flexibility and make it more useful to the private sector.
- ◆ Continue to monitor developments in environmental regulations, tax incentives, and funding sources.
- ◆ Continue to seek state and federal funding opportunities to address brownfield issues. A good track record in obtaining State-level resources exists, but further opportunities are most likely



available (e.g. site reclamation funds, state revolving loan funds and renaissance funds). Pursue a brownfield pilot program grant from U.S. EPA.

- Enact a groundwater use ordinance that prohibits the installation and use of potable wells in areas with known groundwater contamination.
- Finalize the development of a Brownfield Redevelopment Authority. Use the brownfield site map prepared under the master plan as the basis for defining a City-wide brownfield zone.
- Expand on the work done under the Site Assessment Fund grant to determine the marketability of identified brownfield sites.
- Continue to implement sound goaloriented land use planning implementation. Coordinate with brownfield efforts to identify rezoning and infrastructure needs. Consider environmental issues when evaluating infrastructure needs. Integrate utility upgrades with any required remediation.
- Host a workshop that provides information on brownfield redevelopment and financial and tax incentives.



Site Name	Location	Pollutants	Status	
1. Old City of Muskegon Dump	61-10N-16W-17BD	Domestic, Commmercial, Light	No Actions Taken	
		Industrial		
2. Nordco Drum Getty Street	61-10N-16W-29DA	Phthalates, BTEX, TCE	Evaluation/Interim Response -Fund	
3. Theresa Street Area	61-10N-16W-33AB	Nickel, TCE	Evaluation/Interim Response -Fund	
4. Whittaker Electric	61-10N-16W-31BA	PCB, DCE	Evaluation/Interim Response -Fund	
5. American Coil Spring Co.	61-10N-16W-33BD	Chromium, TCE, 1,2 DCE	Evaluation/Interim Response -PRP/Other	
6. Amoco Oil Terminal	61-10N-17W-25	BTEX, MTBE	Evaluation/Interim Response -PRP/Other	
7. Anaconda Industries	61-10N-17W-25BD	Cresols, Organics	Evaluation/Interim Response -PRP/Other	
8. Goetze Corporation	61-10N-16W-31AB	Chromium, TCE, 1,2 DCE	Evaluation/Interim Response -PRP/Other	
9. Grand Trunk Railroad Dock	61-10N-17W-35BA	BTEX, Naphthalene	Evaluation/Interim Response -PRP/Other	
10. MichCon Lakey Foundry	61-10N-16W-19CD	Xylene, Toluene, Zinc, Lead,	Evaluation/Interim Response -PRP/Other	
		Benzene		
11. Old Muskegon Wastewater Treatment	61-10N-16W-17CA	Benzidine, Arsenic, Nitrobenzene	Evaluation/Interim Response -PRP/Other	
Plant				
12. Our Lady of Grace Church Gas	61-10N-16W-20AD	Benzene, Toluene, Xylene	Evaluation/Interim Response -PRP/Other	
Contamination				
13. Sealed Power Corporation - Sanford Street	61-10N-16W-31AB	Trichloroethylene, Dichloroethene	Evaluation/Interim Response -PRP/Other	
14. Brunswick Corporation	61-10N-16W-30CC	Toluene	Final Cleanup - PRP/Other	
Source: "Michigan Sites of Environmental Contamination," Volume I April 1995 for Fiscal Year 1996, Michigan Department of Natural Resources, Environmental Response Division				

Table 8.1 Part 201 of NREPA Site Inventory





Name	Location

Central Transport
 Sure-Line Screw Products
 Public Service Building - City of Muskegon
 D. Wasser #1

3. Polymer #1
3. Public Service Building - City of Muskegon
3. Public Service Building - City of Muskegon
3. Public Service Building - City of Muskegon

4. S.D. Warren #1 2400 Lakeshore Drive

5. Wesco #136. Laketon Auto Clinic1087 West Laketon Avenue

7. United Station #6306 - West Laketon 860 West Laketon Avenue

8. Hartshorn Marina 920 Western

9. Fisher Steel 259 Ottawa Street

10. Charles Service Center10. Charles Service Center11. Great Lakes Plating Corporation710 Pulaski Avenue

12. Acme Cleaners 1780 Beidler Street

13. United Station #6294 - Peck Street #1 1989 Peck Street
14. Video Movies 1801 Peck Street

15. United Station #6300 - Laketon Avenue #1 1045 East Laketon Avenue

16. Sealed Power Hy-Lift Division17. Muskegon Correctional Facility2400 South Sheridan Road

18. Pri-Per Investment Company Property 4 East Webster Avenue

19. Reed Tire Service 9 East Webster Avenue

Source: "Michigan Sites of Environmental Contamination," Volume I April 1995 for Fiscal Year 1996, Michigan Department of Natural Resources, Environmental Response Division

Table 8.2

Leaking Underground Storage Tank (LUST) Site Inventory